



# CITY OF LODI

## COUNCIL COMMUNICATION

AGENDA TITLE: Communications (June 11, 1992 through June 23, 1992)

MEETING DATE: July 1, 1992

PREPARED BY: City Clerk

### RECOMMENDED ACTION:

#### AGENDA ITEM

#### RECOMMENDATION

Information only.

**BACKGROUND INFORMATION:** The following communication was received between the dates of June 11, 1992 and June 23, 1992.

Notice has been received from the Federal Energy Regulatory Commission that Pacific Gas & Electric Company (PG&E) tendered for filing a Rate Schedule for the Interconnection of the California-Oregon Transmission Project (COTP) and the PG&E Electric System. This rate schedule sets forth the rates, terms and conditions under which PG&E offers to the owners of the COTP to interconnect that transmission facility with the PG&E electric system and to operate its system in parallel with the COTP.

Further, a Notice to Intervene in the above referenced matter has been received from the State of California Department of Water Resources.

**FUNDING:** None required.

*Alice M. Keimche*  
Alice M. Keimche  
City Clerk

AMR/jmp

COUNCOM8/TXTA.02J/COUNCOM

APPROVED: \_\_\_\_\_

THOMAS A. PETERSON  
City Manager



recycled paper

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company ) Docket No. ER92-595-0001

RECEIVED  
JUN 11 1992  
FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426

NOTICE OF FILING

(June 5, 1992)

Take notice that on June 1, 1992, Pacific Gas and Electric Company (PG&E) tendered for filing a Rate Schedule For the Interconnection of the California-Oregon Transmission Project (COTP) and the PG&E Electric System. This rate schedule sets forth the rates, terms and conditions under which PG&E offers to the owners of the COTP to interconnect that transmission facility with the PG&E electric system and to operate its system in parallel with the COTP.

Copies of this filing have been mailed to the owners of the COTP; the United States Department of Energy, Western Area Power Administration; the Carmichael Water District; the city of Vernon, California; the San Juan Suburban Water District; the Shasta Dam Area Public Utility District; the Southern Sal Joaquin Valley Power Authority; and the Transmission Agency of Northern California, including the following of its members: the California cities of Alameda, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara and Ukiah, the Modesto Irrigation District, the Plumas-Sierra Rural Electric Cooperative, the Sacramento Municipal Utility District and the Turlock Irrigation District; and to the California Department of Water Resources and the California Public Utilities Commission.

Any person desiring to be heard or to protest said filing should file a motion to intervene or protest with the Federal Energy Regulatory Commission, 825 North Capitol Street, N.E., Washington, D.C. 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211 and 18 CFR 385.214). All such motions or protests should be filed on or before June 19, 1992. Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a motion to intervene. Copies of this filing are on file with the Commission and are available for public inspection.

Lois D. Cashell  
Secretary

NOTE: Copy of full exhibit is on file in the City Clerk's Office

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

RECEIVED  
92 JUN 19 PM 12:41  
ALICE M. REYNOLDS  
CITY CLERK  
CITY OF LOS ANGELES

PACIFIC GAS AND ELECTRIC COMPANY )  
 )  
 )

Docket No. ER92-595-000

MOTION TO INTERVENE  
BY THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF CALIFORNIA

DANIEL E. LUNGREN  
Attorney General

WALTER E. WUNDERLICH  
Acting Assistant Attorney General

MARK J. URBAN  
Deputy Attorney General

1515 K Street, Suite 511  
P.O. Box 944255  
Sacramento, California 94244-2550  
Telephone: (916) 324-5347

Attorneys for the California  
Department of Water Resources

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

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Pacific Gas and Electric  
Company

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)  
) Docket No. ER92-595-000  
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)

WESTERN AREA POWER ADMINISTRATION  
MOTION TO INTERVENE, TO CONSOLIDATE,  
AND REQUEST FOR HEARING  
(June 29, 1992)

The Western Area Power Administration ("Western"), an agency of the U.S. Department of Energy ("DOE"), files this Motion to Intervene, To Consolidate, and Request for Hearing in this docket. Western makes this filing in accordance with the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure.<sup>1</sup>

I. Introduction

On June 1, 1992, the Pacific Gas and Electric Company ("PG&E") tendered for filing with the Commission a Rate Schedule for the Interconnection of the California-Oregon Transmission Project ("COTP") and the PG&E Electric System. The Commission issued a Notice of Filing on June 5, 1992, with motions to intervene or protests due by June 19, 1992. By Order dated June 18, 1992, the Commission extended the filing deadline to June 29, 1992.

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<sup>1</sup> 18 CFR Part 385 (1991).

Construction of the COTP was authorized by the Energy and Water Development Appropriation Act, 1985,<sup>2</sup> which provided that:

Notwithstanding the provisions of section 8 of Public Law **88-552**, the Secretary of Energy is authorized to construct or participate in the construction of such additional facilities as he deems necessary to allow mutually beneficial power **sales** between the Pacific Northwest and California and to accept funds contributed by non-Federal entities for that purpose:

On December 19, 1984, Western, virtually all the public power entities in northern California, including a consortium of public power entities represented by the Transmission Agency of Northern California ("TANC"), PG&E, Southern California Edison Company, San Diego Gas and Electric Company, the Los Angeles Department of Water and Power, and the California Department of Water Resources executed a Memorandum of Understanding ("MOU") for the COTP. The MOU set forth the general plan for construction and operation of the COTP. The Supplemental Appropriations Act for Fiscal Year 1985 approved the MOU, and named the project "The Harold T. (Bizz) Johnson California-Pacific **Northwest** Intertie **Line**."<sup>3</sup> An Annex to the MOU was executed as of

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<sup>2</sup> Act of July 16, 1984, Pub. L. No. 98-360, 98 Stat. 403, 416. The cited portion of the Act is codified at 16 U.S.C. § 837g-1.

<sup>3</sup> Act of August 15, 1985, Pub. L. No. 99-88, 99 Stat. 293, 321; H.R. Rep. No. 99-142, 99th Cong., 1st Sess. 83-84 (1985); S. Rep. No. 99-82, 99th Cong., 1st Sess. 102 (1985); H.R. Rep. No. 99-236, 99th Cong., 1st Sess. 51-52 (1985).

February 22, 1986, which added additional participants to the COTP.

## II. Motion to Intervene

Western is a signatory to the MOU and subsequent COTP documents, and has entitlements to capacity in the COTP. Western will be directly affected by any interconnection and operating arrangements which may be established in this docket, and no other party can represent Western's interests effectively. Western opposes PG&E's filing in this Docket, and instead supports the filing by the Transmission Agency of Northern California in Docket EL92-26-000. Western believes that the TANC Interconnection and Coordinated Operations Rate Schedule represents a fair, sound, and reasonable means of achieving the purposes of the COTP.

For these reasons, Western requests the Commission to grant its Motion to Intervene in this docket. Western requests that all correspondence, pleadings, and other communications concerning this docket be served upon:

Michael S. HacsKaylo  
Office of General Counsel  
Western Area Power Administration  
P.O. Box 3402  
Golden, CO 80401-3398

Western also requests that an additional copy of any correspondence and orders be sent to:

David G. Coleman  
Area Manager  
Western Area Power Administration  
1825 Bell Street, Suite 105  
Sacramento, CA 95825-1097

111. Motion to Consolidate

To date, the Commission has issued Notices of Filing on COTP issues in 5 dockets.<sup>4</sup> Four of the 5 dockets<sup>5</sup> deal with COTP interconnection and operational issues. Western believes that it would serve the public interest in a rapid resolution of these related matters if the Commission consolidates Docket EL92-26-000 (TANC, May 21, 1992); Docket EL92-32-000 (Vernon, June 4, 1992); Docket ER92-595-000 (PG&E, June 5, 1992); and Docket ER92-626-000 (Southern California Edison, et al., June 12, 1992) into one proceeding.<sup>6</sup>

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<sup>4</sup> Docket EL92-26-000 (TANC, May 21, 1992); Docket EL92-32-000 (Vernon, June 4, 1992); Docket ER92-595-000 (PG&E, June 5, 1992); Docket ER92-596-000 (PG&E, June 9, 1992); and Docket ER92-626-000 (Southern California Edison, et al., June 12, 1992).

<sup>5</sup> Docket EL92-26-000 (TANC, May 21, 1992); Docket EL92-32-000 (Vernon, June 4, 1992); Docket ER92-595-000 (PG&E, June 5, 1992); and Docket ER92-626-000 (Southern California Edison, et al., June 12, 1992).

<sup>6</sup> The remaining docket, ER92-596-000, deals with transmission service by PG&E to TANC under an existing TANC-PG&E Coordinated Transmission Service contract. Western believes that this docket should stand alone.

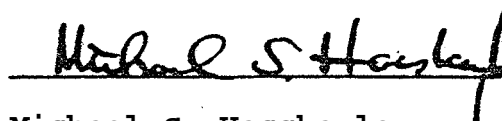
#### IV. Request for Hearing

Should the Commission grant Western's Motion to Intervene, Western also moves the Commission to schedule a hearing in this and related dockets. Given the complexities of the issues at hand, a hearing will serve the public interest by permitting intervenors to present their views on COTP interconnected operations and related matters.

#### V. Conclusion

For the reasons stated herein, Western requests the Commission to grant its Motion to Intervene, its Motion for Consolidation, and schedule a hearing in this docket.

Respectfully submitted,



Michael S. Hacskeylo  
Office of General Counsel  
Western Area Power Administration  
1627 Cole Boulevard  
P.O. Box 3402  
Golden, CO 80401-3398  
(303) 231-1534  
Fax No. (303) 231-7486



CERTIFICATE OF SERVICE  
FERC Docket ER92-595-000

I hereby certify that on June 29, 1992, I mailed a copy of the

WESTERN AREA POWER ADMINISTRATION  
MOTION TO INTERVENE, TO CONSOLIDATE,  
AND REQUEST FOR HEARING

by first class mail, postage prepaid, to:

Peter Arth, Jr., General Counsel  
California Public Utilities Commission  
State Building, Room 5138  
505 Van Ness Avenue  
San Francisco, CA 94102

California Department of Water Resources  
Chief, Energy Division  
P.O. Box 942836  
Sacramento, CA 94236-0001

Carmichael Water District  
Director  
7001 Fair Oaks Boulevard  
Carmichael, CA 95608

city of Vernon  
City Administrator  
4305 Santa Fe Avenue  
Vernon, CA 90058

San Juan Suburban Water District  
General Manager and Secretary  
P.O. Box 2157  
Roseville, CA 95746

Shasta Dam Area Public Utility District  
President  
P.O. Box 777  
Central Valley, CA 96019

southern San Joaquin Valley Power Authority  
Manager  
21 "F" Street, Suite 100  
Bakersfield, CA 93301

Transmission Agency of Northern California  
Chairman  
P.O. Box 15129  
Sacramento, CA 95851-0129

City of Alameda  
City Clerk, City Hall  
Santa Clara Avenue and Oak Street  
Alameda, CA 94501

City of Healdsburg  
City Clerk, City Hall  
126 Matheson Street  
Healdsburg, CA 95448

city of Lodi  
City Clerk, City Hall  
305 West Pine Street  
Lodi, CA 95240

city of Lompoc  
City Clerk, City Hall  
100 Civic Center Plaza  
Lompoc, CA 93438

city of Palo Alto  
City Clerk, City Hall  
250 Hamilton Avenue  
Palo Alto, CA 94301

City of Redding  
City Clerk, City Hall  
760 Parkview Avenue  
Redding, CA 96001

City of Roseville  
City Clerk, City Hall  
311 Vernon Street  
Roseville, CA 95678

San Diego Gas and Electric Company  
Senior Vice President  
Electric Operations  
P.O. Box 1831  
San Diego, CA 92112

city of Santa Clara  
City Clerk, City Hall  
1500 Warburton Avenue  
Santa Clara, CA 95050

Southern California Edison Company  
Vice President  
System Planning & Operations  
P.O. Box 800  
Rosemead, CA 91770

city of Ukiah  
City Clerk, City Hall  
300 Seminary Avenue  
Ukiah, CA 95482

Modesto Irrigation District  
Chief Executive Officer  
P.O. Box 4050  
Modesto, CA 95532

Plumas-Sierra REC  
2329 Chandler Road  
Quincy, CA 95971-0715

Turlock Irrigation District  
General Manager  
P.O. Box 949  
Turlock, CA 95381-0949


Jan Shori, Esq.  
Sacramento Municipal Utility District  
6201 S Street  
Sacramento, CA 95817-1899

Stuart K. Gardiner, Attorney  
Pacific Gas and Electric Company  
P.O. Box 7442  
San Francisco, CA 94120

Robert J. Haywood  
Vice President-Power Planning and Contracts  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94106

Arnold H. Quint  
Hunton & Williams  
2000 Pennsylvania Avenue, NW  
Washington, DC 20036

Sarah McNary  
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Bonneville Power Administration  
P.O. BOX 3621  
Portland, OR 97208



Bonnie L. Johnson  
Office of General Counsel  
Western Area Power Administration  
P.O. Box 3402  
Golden, CO 80401-3398  
303-231-1534  
Fax No. 303-231-7486

1 UNITED STATES OF AMERICA  
2 BEFORE THE  
3 FEDERAL ENERGY REGULATORY COMMISSION

4 PACIFIC GAS AND ELECTRIC COMPANY )

Docket No. ER92-596-000

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7 MOTION TO INTERVENE OF SOUTHERN  
8 SAN JOAQUIN VALLEY POWER AUTHORITY  
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Edward J. Tiedemann  
Janet K. Goldsmith  
KRONICK, MOSKOVITZ, TIEDEMANN  
& GIRARD

A Professional Corporation  
770 L Street, Suite 1200  
Sacramento, California 95814  
(916) 444-8920

Attorneys for Southern San  
Joaquin Valley Power Authority

1 UNITED STATES OF AMERICA  
2 BEFORE THE  
3 FEDERAL ENERGY REGULATORY COMMISSION

4 PACIFIC GAS AND ELECTRIC COMPANY ) Docket No. ER92-596-000

5  
6 MOTION TO INTERVENE OF SOUTHERN  
7 SAN JOAQUIN VALLEY POWER AUTHORITY

8 The Southern San Joaquin Valley Power Authority  
9 ("Southern San Joaquin"), by and through its counsel, Edward J.  
10 Tiedemann and Janet K. Goldsmith, Kronick, Moskowitz, Tiedemann &  
11 Girard, a professional corporation, 770 L Street, Suite 1200,  
12 Sacramento, California 95814 files this Motion to Intervene and  
13 says as follows:

14 I.

15 PRELIMINARY STATEMENT

16 1. This motion is filed in accordance with  
17 Sections 205 and 206 of the Federal Power Act, 16 U.S.C. §§ 824d  
18 and 824e ("FPA"), pursuant to Rules 212 and 214 of the Rules of  
19 Practice and Procedure of the Federal Energy Regulatory  
20 Commission ("FERC" or "Commission"), 18 C.F.R. §§ 385.212 and  
21 385.214 (1991), and pursuant to the Commission's Notice of Filing  
22 issued on June 4, 1992 as amended June 9, 1992.

23 2. The persons to whom correspondence, pleadings, and  
24 other papers with regard to this proceeding should be addressed  
25 and the persons whose names are to be placed on the Commission's  
26 official service list are designated as follows in accordance  
27 with Rule 203, 18 C.F.R. § 385.203 (1990):  
28

1 Mr. H. Ronald Lampson  
2 General Manager  
3 Southern San Joaquin Valley  
4 Power Authority  
5 2100 "F" Street, Suite 100  
6 Bakersfield, California 93301

Mr. Edward J. Tiedemann  
Kronick, Moskovitz, Tiedemann  
& Girard  
770 L Street, Suite 1200  
Sacramento, California 95814

11.

NATURE OF THE PARTIES

3. Southern San Joaquin, is a joint powers agency organized and existing under the laws of **the** State of California.<sup>1</sup> Among Southern San Joaquin's purposes are participation in the California-Oregon Transmission Project ("COTP") and the acquisition of electric energy necessary to pump and distribute water. Southern San Joaquin is **a** Participant in the COTP. The COTP is an AC Intertie expansion project designed to increase the transfer capability between the Pacific Northwest and California by at least sixteen hundred megawatts (1600 MW) and is designed to be interconnected with and operated in parallel with **the** PG&E electric system and the Pacific AC Intertie facilities as the third line in the system. Southern San Joaquin's member districts purchase substantial amounts of power and energy from Pacific Gas & Electric Company (PG&E) and Southern California Edison Company for use in pumping and distributing water for irrigation.

<sup>1</sup> Southern San Joaquin's members are: Alpaugh Irrigation District, Belridge Water Storage District, Berrenda Mesa Water District, Cawelo Water District, Delano-Earlimart Irrigation District, Kern-Tulare Water District, Lindsay-Strathmore Irrigation District, Lost Hills Water District, **Lower** Tule River Irrigation District, Orange Cove Irrigation District, Rag Gulch Water District, Semitropic Water Storage District, Southern San Joaquin Municipal Utility District, Terra Bella Irrigation District, Wheeler Ridge-Maricopa Water Storage District.

1           4.    Pacific Gas & Electric Company is an investor-  
2 owned utility which generates, transmits, distributes and sells  
3 electric power and energy at wholesale and retail in large areas  
4 of California. PG&E is a "public utility" as defined in  
5 Section 201 of the FPA, 16 U.S.C. § 824(e), and is subject to the  
6 jurisdiction of this Commission.

7           5.    Transmission Agency of Northern California  
8 ("TANC") is a joint powers agency, organized and existing under  
9 the laws of the State of California and is a "municipality" as  
10 defined in Section 3(7) of the Federal Power Act, 16 U.S.C. §  
11 796(7). TANC's primary purpose is to provide electric  
12 transmission facilities and services for the use of its members.<sup>2</sup>  
13 TANC, as well as Southern San Joaquin and others, are  
14 participants in the COTP.

15                               III.

16                               BACKGROUND

17           6.    On June 1, 1992, Pacific Gas and Electric Company  
18 tendered for filing with the Commission a Rate Schedule For the  
19 COTP Transmission Service provided to Southern San Joaquin and  
20 TANC. This rate schedule purports to establish the terms,  
21 conditions and rates applicable to the delivery of power from the  
22 COTP over the PG&E transmission system to Southern San Joaquin  
23 and TAW.

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25           <sup>2</sup> TANC's members are the California Cities of Alameda,  
26 Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding,  
27 Roseville, Santa Clara, and Ukiah, and the Plumas-Sierra Rural  
28 Electric Cooperative, the Sacramento Municipal Utility District,  
the Modesto Irrigation District and the Turlock Irrigation  
District.



1           7.    This docket concerns the same subject matter and  
2 services at issue in FERC Docket No. ER 92-595-000 in which PG&E  
3 filed a proposed interconnection rate schedule, and to FERC  
4 Docket No. ER 92-26-000, a proceeding initiated by TANC on May 6,  
5 1992, seeking an order providing the **terms** and conditions for  
6 interconnection and coordinated operation of the COTP with the  
7 essential facilities of PG&E and the Pacific AC Intertie. It is  
8 also factually related to FERC Docket No. ER 92-626-000, in which  
9 PG&E, Southern California Edison Co. ("SCE") and San Diego Gas &  
10 Electric Company ("SDG&E") unilaterally filed a "Coordinated  
11 Operations Agreement" purporting to govern the coordinated  
12 operation of the Pacific AC Intertie with the COTP.

13           8.    Southern San Joaquin has filed a motion to intervene in  
14 FERC ER 92-26-000 and is filing motions to intervene in FERC ER  
15 92-595-000, FERC ER 92-626-000 as well as in this proceeding.

16                           IV.

17                           SOUTHERN SAN JOAQUIN'S INTERESTS

18           9.    In its Rate Schedule filed with this Commission on  
19 June 1, PG&E requested approval of rates, terms and conditions  
20 governing the transmission and delivery of power from the COTP of  
21 the COTP through PG&E's transmission system to Southern San  
22 Joaquin and TANC. As a COTP Participant, Southern San Joaquin  
23 will receive the ownership benefits of the utilization of the  
24 transfer capability of the COTP and will be directly affected by  
25 the rates, terms and conditions upon which the COTP is permitted  
26 to utilize PG&E's transmission system.

27    ///

V.

MOTION TO INTERVENE

8. Southern San Joaquin has a direct interest in this proceeding which will not be adequately addressed or represented by any other party and therefore requests that it be granted intervenor status and be permitted to participate fully in this proceeding to protect its interests as they may appear. Southern San Joaquin's participation in this case will be in the public interest. While Southern San Joaquin raises no specific substantive or affirmative issues at this time, it reserves the right to address any issues which may develop or are identified after discovery, or during the course of any hearing which may be conducted.

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VI.

CONCLUSION

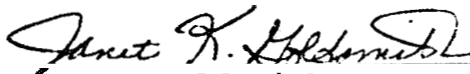
WHEREFORE, For the foregoing reasons, the Southern San Joaquin Valley Power Authority claims the right to intervene and participate fully as a party to this proceeding for the protection of its interest and hereby petitions and requests that this Commission grant its intervention in this proceeding.

Dated: June 26, 1992

Respectfully submitted,

KRONICK, MOSKOVITZ, TIEDEMANN  
& GIRARD  
A Professional Corporation  
770 L Street, Suite 1200  
Sacramento, California 95814  
(916) 444-8920

By:

  
Janet K. Goldsmith  
Attorneys for the Southern San  
Joaquin Valley Power Authority

60223.1

CERTIFICATE OF SERVICE

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action. My business address is c/o KRONICK, MOSKOVITZ, FIEDEMANN & GIRARD, 770 L Street, Suite 1200, Sacramento, California 95814-3363. On June 26, 1992, I served the within MOTION TO INTERVENE OF SOUTHERN SAN JOAQUIN VALLEY POWER AUTHORITY by placing a true copy of thereof, enclosed in a sealed envelope with postage thereon fully prepaid, via Federal Express, at Sacramento, California, addressed as follows:

SEE ATTACHED LIST

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 1992 at Sacramento, California.

Sandy Matthews

1 Peter Arth, Jr.  
General Counsel  
2 California Public Utilities Commission  
State Building, Room 5138  
3 505 Van Ness Avenue  
San Francisco, California 94102  
4  
5 United States Department of Energy  
Western Area Power Administration  
1835 Dell Street, Suite 105  
6 Sacramento, California 95825  
7  
8 California Department of Water Resources  
Chief, Energy Division  
1416 Ninth Street (95814)  
P.O. Box 942836  
9 Sacramento, California 94236-0001  
10  
11 Carmichael Water District  
Director  
7001 Fair Oaks Boulevard  
Carmichael, California 95608  
12  
13 Bruce V. Malkenhorst  
City of Vernon, California  
4305 Santa Fe Avenue  
14 Vernon, California 90058  
15  
16 David B. Brearley  
City of 'Vernon', California  
Unit 223  
2440 S. Hacienda Boulevard  
17 Hacienda Heights, California 91745  
18  
19 San Juan Suburban Water District  
General Manager and Secretary  
9935 Auburn Folsom Road (9566:)  
P.O. Box 2157  
20 Roseville, California 95746  
21  
22 Shasta Dam Area Public Utility District  
President  
1650 Stanton Drive  
P.O. Box 777  
23 Central Valley, California 96019  
24  
25 H. Ronald Lampson  
Southern San Joaquin Valley Power Authority  
2100 F Street, Suite 100  
26 Bakersfield, California 93301  
27  
28

1 John R. Marcotte  
Transmission Agency of Northern California  
2 3100 Zinfandel Drive (Rancho Cordova 95670)  
P.O. Box 15129  
3 Sacramento, California 95851-0129

4 Wallace L. Duncan  
James D. Pembroke  
5 Duncan, Weinberg, Miller & Pembroke, P.C.  
1615 M Street, NW, Suite 800  
6 Washington, D.C. 20036

7 City of Alameda  
City Clerk, City Hall  
8 Santa Clara Avenue and Oak Street  
Alameda, California 94501

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20 City Clerk, City Hall  
760 Parkview Avenue  
21 Redding, California 96001

22 City of Roseville

23

24

25 Stephen L. Baum  
General Counsel  
San Diego Gas and Electric Company  
26 101 Ash Street (92101)  
P.O. Box 1831  
27 San Diego, California 92112

28

1 City of Santa Clara  
City Clerk, **City Hall**  
2 **1500 Warburton Avenue**  
Santa Clara, California **95050**  
3  
4 David N. Barry  
General Counsel  
Southern California Edison Company  
5 **244 Walnut Grove Avenue**  
P.O. Box 800  
6 **Losmead, California 91770**  
7  
8 City of Ukiah  
City Clerk, City Hall  
9 **100 Seminary Avenue**  
Ukiah, California **95482**  
10  
11 Modesto Irrigation District  
Chief Executive Officer  
231 Eleventh Street  
12 **P.O. Box 4050**  
Modesto, California **95532**  
13  
14 Plumas-Sierra REC  
1329 Chandler Road  
Quincy, California 95971-0715  
15  
16 Ernest Geddes  
Purlock Irrigation District  
333 E. Canal Drive  
17 **P.O. Box 949**  
Purlock, California **95380-0949**  
18  
19 Jan Shori, Esq.  
Sacramento Municipal Utility District  
6201 S Street  
Sacramento, California **95817-1899**  
20  
21 Wallace L. Duncan  
Duncan, Weinberg, Miller & Pembroke (DC)  
1615 M Street, NW, Suite 800  
Washington, D.C. 20036  
22  
23 David P. Yaffe  
Duncan & Allen  
1575 Eye Street, NW, Suite 300  
24 Washington, D.C. 20005-1175  
25  
26 Kenneth Dederio  
City of Vernon, California  
4305 Santa Fe Avenue  
Vernon, California 90058  
27  
28

1 Arnold Fieldman  
Goldberg, Fieldman & Latham, P.C.  
2 1100 Fifteenth Street, NW, Suite 200  
Washington, D.C. 20005

3  
4 Howard V. Golub  
General Counsel  
Pacific Gas & Electric Company  
5 77 Beale Street  
San Francisco, California 94106

6  
7 Marcus Wood  
Stoel Rives Boley Jones & Grey  
900 SW Fifth Avenue  
8 Portland, Oregon 97204-1268

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1 UNITED STATES OF AMERICA  
2 FEDERAL ENERGY REGULATORY COMMISSION  
3

4 PACIFIC GAS AND ELECTRIC COMPANY ) Docket No. ER92-595-000  
5

6  
7 MOTION TO INTERVENE OF SOUTHERN  
8 SAN JOAQUIN VALLEY POWER AUTHORITY  
9

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Attorneys for Southern San  
Joaquin Valley Power Authority

1 UNITED STATES OF AMERICA  
2 FEDERAL ENERGY REGULATORY COMMISSION  
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4 PACIFIC GAS AND ELECTRIC COMPANY ) Docket No. ER92-595-000  
5

6 MOTION TO INTERVENE OF SOUTHERN  
7 SAN JOAQUIN VALLEY POWER AUTHORITY  
8

9 The Southern San Joaquin Valley Power Authority  
10 ("Southern San Joaquin"), by and through its counsel, Edward J.  
11 Tiedemann and Kronick, Moskovitz, Tiedemann & Girard, a  
12 professional corporation, 770 L Street, Suite 1200, Sacramento,  
13 California 95814 files this Motion to Intervene and says as  
14 follows:

15 I.

16 PRELIMINARY STATEMENT

17 1. This motion is filed in accordance with  
18 Sections 205 and 206 of the Federal Power Act, 16 U.S.C. §§ 824d  
19 and 824e ("FPA"), pursuant to Rules 212 and 214 of the Rules of  
20 Practice and Procedure of the Federal Energy Regulatory  
21 Commission ("FERC" or "Commission"), 18 C.F.R. §§ 385.212 and  
22 385.214 (1991), and pursuant to the Commission's Notice of Filing  
23 issued on June 5, 1992.

24 2. The persons to whom correspondence, pleadings, and  
25 other papers with regard to this proceeding should be addressed  
26 and the persons whose names are to be placed on the Commission's  
27 official service list are designated as follows in accordance  
28 with Rule 203, 18 C.F.R. § 385.203 (1990):

1 Mr. H. Ronald Lampson  
2 General Manager  
3 Southern San Joaquin Valley  
4 Power Authority  
5 2100 "F" Street, Suite 100  
6 Bakersfield, California 93301

Mr. Edward J. Tiedemann  
Kronick, Moskovitz, Tiedemann  
& Girard  
770 L Street, Suite 1200  
Sacramento, California 95814

## II.

### NATURE OF THE PARTIES

3. Southern San Joaquin is a joint powers agency organized and existing under the laws of the State of California.<sup>1</sup> Among Southern San Joaquin's purposes are participation in the California-Oregon Transmission Project ("COTP") and the acquisition of electric energy necessary to pump and distribute water. Southern San Joaquin is a Participant in the COTP. The COTP is an AC Intertie expansion project designed to increase the transfer capability between the Pacific Northwest and California by at least sixteen hundred megawatts (1600 MW) and is designed to be interconnected with and operated in parallel with the PG&E electric system and the Pacific AC Intertie facilities as the third line in the system. Southern San Joaquin's member districts purchase substantial amounts of power and energy from Pacific Gas & Electric Company (PG&E) and Southern California Edison Company for use in pumping and distributing water for irrigation.

---

<sup>1</sup> Southern San Joaquin's members are: Alpaugh Irrigation District, Belridge Water Storage District, Berrenda Mesa Water District, Cawelo Water District, Delano-Earlimart Irrigation District, Kern-Tulare Water District, Lindsay-Strathmore Irrigation District, Lost Hills Water District, Lower Tule River Irrigation District, Orange Cove Irrigation District, Rag Gulch Water District, Semitropic Water Storage District, Southern San Joaquin Municipal Utility District, Terra Bella Irrigation District, Wheeler Ridge-Maricopa Water Storage District.

1           4. Pacific Gas & Electric Company is an investor-  
2 owned utility which generates, transmits, distributes and sells  
3 electric power and energy at wholesale and retail in large areas  
4 of California. PG&E is a "public utility" as defined in  
5 Section 201 of the FPA, 16 U.S.C. § 824(e), and is subject to the  
6 jurisdiction of this Commission.

7           5. Transmission Agency of Northern California  
8 ("TANC") is a joint powers agency, organized and existing under  
9 the laws of the State of California and is a "municipality" as  
10 defined in Section 3(7) of the Federal Power Act, 16 U.S.C. §  
11 796(7). TANC's primary purpose is to provide electric  
12 transmission facilities and services for the use of its members.<sup>2</sup>  
13 TANC, as well as Southern San Joaquin and others, are  
14 participants in the COTP.

15                           111.

16                           BACKGROUND

17           6. On June 1, 1992, Pacific Gas and Electric Company  
18 tendered for filing a Rate Schedule For the Intsrconnection of  
19 the COTP and PG&E Electric System. This rate schedule sets forth  
20 the rates and the terms which PG&E offers for the owners of the  
21 COTP to interconnect that transmission facility with the PG&E  
22 electric system and to operate its system in parallel with the  
23 COTP.

---

25           <sup>2</sup> TANC's members are the California Cities of Alameda,  
26 Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding,  
27 Roseville, Santa Clara, and Ukiah, and the Plumas-Sierra Rural  
28 Electric Cooperative, the Sacramento Municipal Utility District,  
the Modesto Irrigation District and the Turlock Irrigation  
District.

IV.

SOUTHERN SAN JOAQUIN'S INTERESTS

7. In its Rate Schedule filed with this Commission on June 1, PG&E requested approval of rates, **terms** and conditions necessary **for** the interconnection and coordinated operation of the **COTP** with the PG&E's electric system at the Pacific AC Intertie **as** set forth in the "California-Oregon Transmission Project - Pacific AC Intertie Interconnection **And** Coordinated Operations Rate Schedule." As **a** COTP Participant, Southern San Joaquin will receive the ownership benefits of the utilization of **the** transfer capability of **the** COTP and will be directly affected by the rates, terms and conditions upon which the COTP is permitted to interconnect with PG&E's system.

V.

MOTION TO INTERVENE

8. Southern San Joaquin has **a** direct interest in this proceeding which will not be adequately addressed or represented by any other party and therefore requests that it be granted intervenor status and be permitted to participate fully in this proceeding to protect its interests as **they** may appear. Southern San Joaquin's participation in this case will be in the public interest. While Southern San Joaquin raises no specific substantive or affirmative issues at this time, it reserves the right to address any issues which may develop or are identified after discovery, or during the course of any hearing which may be conducted.

VI .

CONCLUSION

WHEREFORE, for the foregoing reasons, the Southern San Joaquin Valley Power Authority claims the right to intervene and participate fully as a party to this proceeding for the protection of its interest and hereby petitions and requests that this Commission grant its intervention in this proceeding.

Dated: June 26, 1992

Respectfully submitted,

KRONICK, MOSKOVITZ, TIEDEMANN  
& GIFARD  
A Professional Corporation  
770 L Street, Suite 1200  
Sacramento, California 95814  
(916) 444-8920

By: Janet K. Goldsmith  
Janet K. Goldsmith,  
Attorneys for the Southern San  
Joaquin Valley Power Authority

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CERTIFICATE OF SERVICE

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action. My business address is c/o KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD, 770 L Street, Suite 1200, Sacramento, California 95814-3363. On June 26, 1992, I served the within MOTION TO INTERVENE OF SOUTHERN SAN JOAQUIN VALLEY POWER AUTHORITY by placing a true copy of thereof, enclosed in a sealed envelope with postage thereon fully prepaid, via Federal Express, at Sacramento, California, addressed as follows:

SEE ATTACHED LIST

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 1992 at Sacramento, California.

Lindsay Matthews

1 Peter Arth, Jr.  
General Counsel  
2 California Public Utilities Commission  
State Building, Room 5138  
3 505 Van Ness Avenue  
San Francisco, California 94102  
4  
5 United States Department of Energy  
Western Area Power Administration  
1825 Dell Street, Suite 105  
6 Sacramento, California 95825  
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8 California Department of Water Resources  
Chief, Energy Division  
1416 Ninth Street (95814)  
P.O. Box 942836  
9 Sacramento, California 94236-0001  
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11 Carmichael Water District  
Director  
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13 Bruce V. Malkenhorst  
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16 David B. Brearley  
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17 Hacienda Heights, California 91745  
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22 Shasta Dam Area Public Utility District  
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25 H. Ronald Lampson  
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City Clerk, City Hall  
13 305 West Pine Street  
Lodi, California ,95240

14 City of Lompoc  
15 City Clerk, City Hall  
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16 Lompoc, California '93438

17 City of Palo Alto  
City Clerk, City Hall  
18 250 Hamilton Avenue  
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19 City of Redding  
20 City Clerk, City Hall  
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21 Redding, California 96001

22 City of Roseville  
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24 Stephen L. Baum  
25 General Counsel  
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6 Rosemead, California 91770  
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8 City of Ukiah  
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Ukiah, California 95482  
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10 Modesto Irrigation District  
Chief Executive Officer  
1231 Eleventh Street  
11 P.O. Box 4050  
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13 Plumas-Sierra REC  
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Quincy, California 95971-0715  
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15 Ernest Geddes  
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18 Jan Shori, Esq.  
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24 Washington, D.C. 20005-1175  
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26 Kenneth Dedario  
City of Vernon, California  
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Goldberg, Fieldman & Latham, P.C.  
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3 Edward V. Golub  
4 General Counsel  
Pacific Gas & Electric Company  
5 77 Beale Street  
San Francisco, California 94106

6 Marcus Wood  
7 Stoel Rives Boley Jones & Grey  
900 SW Fifth Avenue  
8 Portland, Oregon 97204-1268

1 UNITED STATES OF AMERICA  
2 BEFORE THE  
3 FEDERAL ENERGY REGULATORY COMMISSION

4 SOUTHERN CALIFORNIA EDISON COMPANY ) Docket No. ER92-626-000  
5 PACIFIC GAS AND ELECTRIC COMPANY )  
6 SAN DIEGO GAS & ELECTRIC COMPANY )

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8  
9 MOTION TO INTERVENE OF SOUTHERN  
10 SAN JOAQUIN VALLEY POWER AUTHORITY

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23 Edward J. Tiedemann  
24 Janet K. Goldsmith  
25 KRONICK, MOSKOVITZ, TIEDEMANN  
26 & GIRARD  
27 A Professional Corporation  
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(916) 444-8920

Attorneys for Southern San  
Joaquin Valley Power Authority

1 UNITED STATES OF AMERICA  
2 BEFORE THE  
3 FEDERAL ENERGY REGULATORY COMMISSION

4 SOUTHERN CALIFORNIA EDISON COMPANY ) Docket No. **ER92-626-000**  
5 )  
6 PACIFIC GAS AND ELECTRIC COMPANY )  
7 )  
8 **SAN DIEGO GAS & ELECTRIC COMPANY** )

9 MOTION TO INTERVENE OF SOUTHERN  
10 SAN JOAQUIN VALLEY POWER AUTHORITY

11 The Southern San Joaquin Valley Power Authority  
12 ("Southern San Joaquin"), **by** and through its counsel, Edward J.  
13 Tiedemann and Janet K. Goldsmith, Kronick, Moskowitz, Tiedemann &  
14 Girard, a professional corporation, 770 L Street, Suite **1200**,  
15 Sacramento, California **95814** files this Motion to Intervene and  
16 **says as follows:**

17 I.

18 PRELIMINARY STATEMENT

19 1. This motion is **filed** in accordance with  
20 Sections **205** and **206** of the Federal Power Act, **16** U.S.C. **§§** 824d  
21 and **824e** ("FPA"), pursuant to Rules **212** and **214** of the Rules of  
22 Practice and Procedure of the Federal Energy Regulatory  
23 Commission ("FERC" or "Commission"), **18** C.F.R. **§§** **385.212** and  
24 **385.214** (1991), and pursuant to the Commission's Notice of Filing  
25 issued on June **12**, **1992**.

26 2. The persona to whom correspondence, pleadings, and  
27 other papers with regard to this proceeding should be addressed  
28 and the persons whose names are to be placed on the Commission's

official service list **are** designated **as** follows in accordance  
with Rule 203, 18 C.F.R. § 385.203 (1990):

Mr. H. Ronald Lampson  
General Manager  
Southern San Joaquin Valley  
**Power** Authority  
2100 "F" Street, Suite 100  
Bakersfield, California 93301

Mr. Zdward J. Tiedemann  
Kronick, Moskovitz, Tiedemann  
& Girard  
770 L Street, Suite 1200  
Sacramento, California 95814

## II.

### NATURE OF THE PARTIES

3. Southern San Joaquin is a joint powers agency organized and existing under the laws of the State of California.\* Among Southern San Joaquin's purposes are participation in the California-Oregon Transmission Project ("COTP") and the acquisition of electric energy necessary to pump and distribute water. Southern San Joaquin is a Participant in the COTP. The COTP is an AC Intertie expansion project designed to increase the transfer capability between the Pacific Northwest and California by at least sixteen hundred megawatts (1600 MW) and is designed to be interconnected with and operated in parallel with the PG&E electric system and the Pacific AC Intertie Facilities as the third line in the system. Southern San Joaquin's member districts purchase substantial amounts of power and energy from Pacific Gas & Electric Company (PG&E) and

1 Southern San Joaquin's members are: Alpaugh Irrigation District, Belridge Water Storage District, Berrenda Mesa Water District, Cawelo Water District, Delano-Earlimart Irrigation District, Kern-Tulare Water District, Lindsay-Strathmore Irrigation District, Lost Hills Water District, Lower Tule River Irrigation District, Orange Cove Irrigation District, Rag Gulch Water District, Semitropic Water Storage District, Southern San Joaquin Municipal Utility District, Terra Bella Irrigation District, Wheeler Ridge-Mexicopa Water Storage District.

1 Southern California Edison Company **for** use in pumping and  
2 distributing **water** for irrigatioc.

3 4. Pacific Gas & Electric Company, San Diego **Gas &**  
4 Electric Company and Southern California Edison Company are  
5 investor-owned utilities which generate, transmit, distribute and  
6 sell electric power and energy at wholesale and retail in large  
7 areas of California. They are all "public utilities" as defined  
8 in Section 201 of the **FPA**, 16 U.S.C. § 824(e), and subject to the  
9 jurisdiction of this Commission.

10 5. Transmission Agency of Northern California  
11 ("TANC") is a joint powers agency, organized and existing under  
12 the laws of the State of California and is a "municipality" as  
13 defined in Section 3(7) of the Federal Power Act, 16 U.S.C. §  
14 **796(7)**. TANC's primary purpose is to provide electric  
15 transmission facilities and services for the use of its **members**.<sup>2</sup>  
16 TANC, as well as Southern **San** Joaquin and others, are  
17 participants in the COTP.

### 18 III.

#### 19 BACKGROUND

20 6. On June 9, 1992, Pacific Gas and Electric Company  
21 tendered for filing with **the** Commission a rate schedule **and**  
22 Coordinated Operations Agreement ("COA") to establish **the** rates,  
23 conditions and terms for the coordinated operation of the Pacific  
24

25 \_\_\_\_\_  
26 <sup>2</sup> TANC's **members** are **the** California Cities of Alameda,  
27 **Biggs**, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding,  
28 Roseville, Santa Clara, and Ukiah, **and the** Plumas-Sierra Rural  
Electric Cooperative, the Sacramento Municipal Utility District,  
the Modesto Irrigation District and the Turlock Irrigation  
District.

1 AC Intertie with the COTP, in which Southern San Joaquin has a  
2 participating interest.

3 7. This docket concerns the same subject matter and  
4 services at issue in FERC Docket No. ER 92-595-000 in which PG&E  
5 filed a proposed interconnection rate schedule, and to FZRC  
6 Docket No. ER 92-26-000, a proceeding initiated by TANC on May 6,  
7 1992, seeking an order providing the terms and conditions for  
8 interconnection and coordinated operation of the COTP with the  
9 essential facilities of PG&E and the Pacific AC Intertie. It is  
10 also factually related to FEHC Docket No. ER 92-596-000, in which  
11 PG&E filed a proposed rate schedule to govern the rates, terms  
12 and conditions on which PG&E would provide transmission and  
13 related services to the COTP and Pacific AC Intertie.

14 8. Southern San Joaquin has filed a motion to intervene in  
15 FERC ER 92-26-000 and is filing motions to intervene in FERC ER  
16 92-595-000 and FERC ER 92-596-000 as well as in this proceeding.

17 IV.

18 SOUTHERN SAN JOAQUIN'S INTERESTS

19 9. In its rate schedule and COA filed with this  
20 Commission on June 9, 1992, PG&E requested approval of the  
21 conditions which will govern the coordinated operation of the  
22 COTP, Pacific AC Intertie and PG&E's system to Southern San  
23 Joaquin and TANC. As a COTP Participant, Southern San Joaquin  
24 will receive the ownership benefits of the utilization of the  
25 transfer capability of the COTP and will be directly affected by  
26 the conditions upon which the COTP is permitted to utilize PG&E's  
27 system.

28 V.



MOTION TO INTERVENE

8. Southern San Joaquin has a direct interest in this proceeding which will not be adequately addressed or represented by any other party and therefore requests that it be granted intervenor status and be permitted to participate fully in this proceeding to protect its interests as they may appear. Southern San Joaquin's participation in this case will be in the public interest. While Southern San Joaquin raises no specific substantive or affirmative issues at this time, it reserves the right to address any issues which may develop or are identified after discovery, or during the course of any hearing which may be conducted.

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VI.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Southern San Joaquin Valley Power Authority claims the right to intervene and participate fully as a party to this proceeding for the protection of its interest and hereby petitions and requests that this Commission grant its intervention in this proceeding.

Dated: June 26, 1992

Respectfully submitted,

KRONICK, MOSKOVITZ, TIEDEMANN  
& GIRARD  
A Professional Corporation  
770 L Street, Suite 1200  
Sacramento, California 95814  
(916) 444-8920

By: Janet K. Goldsmith  
Janet K. Goldsmith  
Attorneys for the Southern San  
Joaquin Valley Power Authority

60233.1

CERTIFICATE OF SERVICE

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action. My business address is c/o KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD, 770 L Street, Suite 1200, Sacramento, California 95814-3363. On June 26, 1992, I served the within MOTION TO INTERVENE OF SOUTHERN SAN JOAQUIN VALLEY POWER AUTHORITY by placing a true copy of thereof, enclosed in a sealed envelope with postage thereon fully prepaid, via Federal Express, at Sacramento, California, addressed as follows:

SEE ATTACHED LIST

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 1992 at Sacramento, California.

Lindsey Matthews

Peter Arth, Jr.  
General Counsel  
California Public Utilities Commission  
State Building, Room 5138  
505 Van Ness Avenue  
San Francisco, California 94102

United States Department of Energy  
Western Area Power Administration  
1825 Dell Street, Suite 105  
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California Department of Water Resources  
Chief, Energy Division  
1416 Ninth Street (95814)  
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Sacramento, California 94236-0001

Carmichael Water District  
Director  
7001 Yair Oaks Boulevard  
Carmichael, California 95608

Bruce V. Malkenhorst  
City of Vernon, California  
4305 Santa Fe Avenue  
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David B. Brearley  
City of Vernon, California  
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San Juan Suburban Water District  
General Manager and Secretary  
9335 Auburn Folsom Road (95661)  
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Shasta Dam Area Public Utility District  
President  
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Lodi, California 95240

14 City of **Lompoc**  
15 City Clerk, City Hall  
100 Civic Center Plaza  
16 Lompoc, California 93438

17 City of Palo Alto  
City Clerk, City Hall  
18 **250** Hamilton Avenue  
**Palo Alto**, California 94301

19 City of Redding  
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21 Redding, California 96001

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24 **Stephen L. Baum**  
25 General Counsel  
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